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January 28, 2019

***Via ECF***

Magistrate Judge Steven M. Gold  
United States District Court  
Eastern District of New York  
225 Cadman Plaza E  
Brooklyn, New York 11201

Re: Shin v. YS2 Enterprises, et al.  
Docket No. : 1:17-cv-05183 (ILG)(SMG)  
Our File No. : ORNA 167417FAC

Dear Magistrate Judge Gold:

This office represents the defendant YS2 Enterprises in the above-referenced matter. This letter is respectfully submitted on behalf of all parties. The parties agree that the Court's guidance is needed to resolve a discovery dispute that has arisen concerning non-party witnesses.

Specifically, the plaintiff has identified certain fact non-party witnesses in this case, namely, Daniel Park and John Kim. However, the attorney for the plaintiff has advised that these non-party witnesses desire to withhold their home addresses from the defendants. The defendants maintain that they are entitled to the home addresses for these non-party witnesses and that these non-party witnesses should be compelled to provide this information.

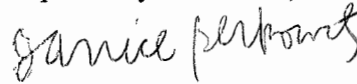
In addition, the plaintiff's attorney has advised that these non-party witnesses have retained his services (without charge) and that he will be representing these non-party witnesses at their non-party depositions. Accordingly, the plaintiff's attorney will be acting as counsel for these non-party witnesses and will be asserting an attorney-client privilege on their behalf. The defendants maintain that this is not proper and object to any claim of privilege/confidentiality between the plaintiff's attorney and any non-party witnesses with respect to any questions relating to the case at hand. The defendants also maintain that they are entitled to any statements secured from these non-party witnesses.

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Page 2

In light of the above, the parties request that the Court schedule a telephone conference call to discuss these issues. The parties have conferred and propose that the conference call be conducted during the afternoon of either February 4, 2019, February 6, 2019 or February 8, 2019 subject to the Court's availability.

Thank you for your consideration of this request.

Respectfully submitted,



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JB/ml

cc: ***Via ECF***

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